

James E. Franklin, Sui Juris  
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**IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF UTAH, NORTHERN DIVISION**

**FILED  
2024 APR 16  
CLERK  
U.S. DISTRICT COURT**

SECURITIES AND EXCHANGE )  
COMMISSION, Plaintiff )  
v. )  
DIGITAL LICENSING, INC. (dba "Debt )  
Box), a Wyoming corporation; JASON R. )  
ANDERSON, an individual; JACOB S. )  
ANDERSON, an individual; SCHAD E. )  
BRANNON, an individual; ROYDON B. )  
NELSON, an individual; JAMES E. )  
FRANKLIN, an individual; WESTERN OIL )  
EXPLORATION COMPANY, INC. a )  
Nevada corporation; RYAN BOWEN, an )  
Individual; IX GLOBAL, LLC, a Utah limited )  
liability company; JOSEPH A. MARTINEZ, )  
an individual; BENJAMIN F. DANIELS, an )  
individual; MARK W. SCHULER, an )  
individual; B & B INVESTMENT GROUP, )  
LLC (dba CORE 1 CRYPTO), a Utah )  
limited liability company; TRAVIS A. )  
FLAHERTY, an individual; ALTON O. )  
PARKER, an individual; BW HOLDINGS, )  
LLC (dba the "FAIR PROJECT), a Utah )  
Limited liability company; BRENDAN J. )  
STANGIS, an individual; MATTHEW D. )  
FRITZSCHE, an individual; )  
Defendants, )  
ARCHER DRILLING, LLC, a Wyoming )  
limited liability company; BUSINESS )  
FUNDING SOLUTIONS, LLC, a Utah )  
limited liability company; BLOX LENDING, )  
LLC, a Utah limited liability company; )  
CALMFRTZ HOLDINGS, LLC, a Utah )  
limited liability company; CALMES & CO. )

Case No. 2:23-cv-00482-RJS

INC., a Utah corporation; FLAHERTY )  
ENTERPRISES, LLC, an Arizona limited )  
liability company; IX VENTURES FZCO, a )  
United Arab Emirates company; PURDY )  
OIL, LLC, a Nebraska limited liability )  
Company; THE GOLD COLLECTIVE LLC, )  
a Utah limited liability company; and UIU )  
HOLDINGS, LLC, a Delaware limited )  
liability company, )  
Relief Defendants. )

### **FILE ON DEMAND**

### **PETITION FOR REIMBURSEMENT OF FEES**

**COMES NOW**, James E. Franklin, by and for JAMES E. FRANKLIN, and PURDY OIL, LLC, providing proof of legal expenses incurred regarding the TRO placed upon me personally, Western Oil Exploration Co., and PURDY OIL LLC, in these proceedings, in accordance with the judgment granting legal fees.

Pursuant to Document Number 275: please see attached reimbursement of invoices for my assistance of counsel.

The Sixth Amendment guarantees assistance of counsel. It does not limit the assistance of counsel to B.A.R.-member attorneys, or to attorneys that have submitted an appearance before the court.

As a Sui Juris accused, I do not have a B.A.R.-member attorney who makes an appearance. However, I am entitled to reimbursement of fees, as awarded by this court, that have been incurred by me, in preparation for my defense in this cause of action regarding the TRO.

There can be no discrimination requiring fees reimbursement only for attorneys who have made an appearance in court. That would violate the Fourteenth Amendment and the Sixth Amendment right to equal opportunity and my right to self-present, with the assistance of counsel that does not or cannot make an appearance due to the court's rules prohibiting non-B.A.R. member counsel from appearing in court.

Pursuant to the Sixth Amendment, this court unconstitutionally deprives me of non-B.A.R. member counsel to make an appearance in this tribunal. The court only allows "licensed" attorneys to make an appearance, even though B.A.R.-member attorneys have no license to practice law. **Schwartz v. Board of Examiners, 353 U.S. 238, 239** "The practice of law CAN NOT be licensed by any state/State." Additionally, the practice of law is an

occupation of common right as stated in ***Sims v. Aherns* 271 S.W. 720 (1925)** “The practice of law is an occupation of common right.” All B.A.R.-member attorneys receive is a certificate that approves them to appear in federal court, and a B.A.R.- member card from their respective state B.A.R.s. Neither one of these are licenses from an authorized agency of one of the several states.

Notwithstanding, an award of legal fees must inure to me, the same as for the elite and privileged class of B.A.R.-member attorneys, denial of which will unconstitutionally deprive me of equal opportunity under the Fourteenth Amendment and discriminate against me for not retaining B.A.R.-member attorneys or for not having B.A.R.-member attorneys make an appearance. ***Brotherhood of Trainmen v. Virginia State Bar* (377 U.S. 1); *Gideon v. Wainwright* 372 U.S. 335; *Argersinger v. Hamlin, Sheriff* 407 U.S. 425** “Litigants may be assisted by unlicensed layman during judicial proceedings.” ***NAACP v. Button* (371 U.S. 415), *United Mineworkers of America v. Gibbs* (383 U.S. 715); *Johnson v. Avery* 89 S. Ct. 747 (1969)** “Members of groups who are competent nonlawyers can assist other members of the group achieve the goals of the group in court without being charged with “unauthorized practice of law.”

Furthermore, ***Title 42 U.S.C. 1983 Awx. 1983, Wood v. Brier, 54 F.R.D. 7, 10-11 (E.D. Wis. 1972) Frankenhauser v. Rizzo, 59 F.R.D. 339 (E.D. Pa. 1973)*** “Each citizen acts as a private **attorney general** who ‘takes on the mantel of sovereign [as a Sui Juris respondent].’ And, ***Elmore v. McCammon* (1986) 640 F. Supp. 905** “...the right to file a lawsuit pro se [sui juris] is one of the most important rights under the constitution and laws.”

Accordingly, please see attached invoices as ***Exhibits A, B, C,***

Thank you in advance for immediately depositing the reimbursement sums into my accounts:

**Purdy Oil, LLC**

Account No. 2301118887  
Wells Fargo Bank  
10675 Scripps Poway Pkwy.  
San Diego, CA 92131  
Phone: 858.695 .7865  
Purdy Oil, LLC.  
200 S. 21st Street  
Suite 400A  
Lincoln, NE 68510

**Western Oil Exploration Company.**

Routing: 124200249

Account: 50014703

First National Bank of Ely

595 Aultman Street

Ely, NV 89301

775-289-4441

Attn: Gina Newton

Western Oil Exploration Company

848 N. Rainbow Blvd., Suite 2880

Las Vegas, NV 89107

Respectfully submitted, this 16th day of April 2024 for and on behalf of James E. Franklin,  
Western Oil Exploration Co, and PURDY OIL LLC.

James E. Franklin 